

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BRAD CALDERON,

Plaintiff,

vs.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION,

Case No.: 19-CV-06792 (JGK)

Defendant.

X

**STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, through his undersigned counsel, and Defendant, through its undersigned counsel, that the above-captioned action be and is hereby dismissed, with prejudice, including without limitation, all claims which Plaintiff has asserted or could have asserted against Defendant, and with no award of attorneys' fees or costs by the Court to any party.

*Dana G. Weisbrod*

Dana G. Weisbrod  
Steven J. Seidenfeld  
JACKSON LEWIS P.C.  
*Attorneys for Defendant*  
666 Third Avenue, 29<sup>th</sup> Floor  
New York, NY 10017  
(212) 545-4000

*Michael P. Hiltferty*

Michael Hiltferty  
Nina A. Ovrutsky  
WHITE, HILFERTY & ALBANESE P.C.  
*Attorneys for Plaintiff*  
570 Lexington Avenue, 16<sup>th</sup> Floor  
New York, NY 10022  
(646) 380-0037

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_ 2020:

\_\_\_\_\_  
Hon. John G. Koeltl  
U.S.D.J.